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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2016 Grand Jury

UNITED STATES OF AMERICA,

Case No. 16CR1996-WQH

Plaintiff,

I N D I C T M E N T
(2nd Superseding)

v.

Title 21, U.S.C., Secs. 959, 960 and 963 - International Conspiracy to Distribute Controlled Substances; Title 21, U.S.C., Secs. 959, 960 - International Distribution of Controlled Substances; Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute Controlled Substances; Title 18, U.S.C., Sec. 1956(a)(1)(B)(i), (a)(2)(B)(i) and (h) - Conspiracy to Launder Monetary Instruments; Title 21, U.S.C., Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture

WONG HUNG NG (6).

aka "Mau."

GILBERTO GERARDO

VILLALOBOS ZAMORA (7),
aka "Lic."

Defendants.

I hereby attest and declare that the foregoing is true and correct. That the foregoing is a true and correct copy of the original document in my custody.

COURT OF APPEAL
SOUTHERN DISTRICT OF CALIFORNIA
M. LOZANO *[Signature]* Deput

The grand jury charges:

Count 1

Count 2

On or about January 29, 2016, in the country of Mexico and elsewhere, defendants [REDACTED] who will first enter the United States within the Southern District of California, did knowingly and intentionally distribute and cause the distribution of 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, intending and knowing that such cocaine would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959 and 960.

Count 3

In or about March 2016, in the country of Mexico and elsewhere,
defendants [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] who will first enter the
United States within the Southern District of California, did knowingly
and intentionally distribute and cause the distribution of 5 kilograms
and more of a mixture and substance containing a detectable amount of
cocaine, a Schedule II Controlled Substance, intending and knowing that
such cocaine would be unlawfully imported into the United States; in
violation of Title 21, United States Code, Sections 959 and 960.

Count 4

In or about May 2016, in the country of Nicaragua and elsewhere, defendants [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], WONG HUNG NG, aka "Mau," and GILBERTO GERARDO VILLALOBOS ZAMORA, aka "Lic," who will first enter the United States within the Southern District of California, did knowingly and intentionally distribute and cause the distribution of 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, intending and knowing that such cocaine would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959 and 960.

Count 5

23 Beginning at a date unknown to the grand jury and continuing up to
24 and including January 2017, within the Southern District of California
25 and elsewhere, defendants [REDACTED] [REDACTED] [REDACTED]

28 WONG HUNG NG, aka "Mau," and GILBERTO

1 GERARDO VILLALOBOS ZAMORA, aka "Lic," did knowingly and intentionally
2 conspire together and with each other and with others known and unknown
3 to the grand jury to possess with intent to distribute and to distribute
4 a controlled substance, to wit: 5 kilograms and more of a mixture and
5 substance containing a detectable amount of cocaine, a Schedule II
6 Controlled Substance; all in violation of Title 21 United States Code,
7 Sections 841(a)(1) and 846.

8 Count 6

9 Beginning at a date unknown to the grand jury and continuing up to
10 and including January 2017, within the Southern District of California
11 and elsewhere, defendants [REDACTED] [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED] [REDACTED] WONG HUNG NG, aka "Mau," and GILBERTO
15 GERARDO VILLALOBOS ZAMORA, aka "Lic," did knowingly combine, conspire,
16 and agree with each other and with other persons known and unknown to
17 the grand jury to commit offenses against the United States, to wit: to
18 knowingly conduct financial transactions affecting interstate commerce
19 and foreign commerce, which transactions involved the proceeds of
20 specified unlawful activity, that is, Conspiracy to Possess With Intent
21 to Distribute and to Distribute Controlled Substances in violation of
22 Title 21, United States Code, Sections 841(a)(1) and 846, knowing that
23 the transactions were designed in whole and in part to conceal and
24 disguise the nature, location, source, ownership, and control of the
25 proceeds of specified unlawful activity, and knowing that the property
involved in the financial transactions represented the proceeds of some
form of unlawful activity, in violation of Title 18, United States Code,
Section 1956(a)(1)(B)(i); and to transport, transmit, and transfer, a

monetary instrument and funds involving the proceeds of specified unlawful activity, that is, Conspiracy to Possess With Intent to Distribute and to Distribute Controlled Substances in violation of Title 21, United States Code, Sections 841(a)(1) and 846, from a place in the United States to and through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); all in violation of Title 18, United States Code, Section 1956(h).

Criminal Forfeiture Allegations

15 1. The allegations contained in Counts 1 through 6 are realleged
16 and by their reference fully incorporated herein for the purpose of
17 alleging forfeiture to the United States of America pursuant to the
18 provisions of Title 21, United States Code, Section 853 and Title 18,
19 United States Code, Section 982.

20 2. As a result of the commission of the felony offenses alleged
21 in Counts 1 through 5 of this 2nd superseding indictment, said violations
22 being punishable by imprisonment for more than one year and pursuant to
23 Title 21, United States Code, Sections 853(a)(1) and 853(a)(2),

24 defendants [REDACTED] [REDACTED] [REDACTED]

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28 VILLALOBOS ZAMORA aka "Lis" shall upon conviction forfeit to the

1 United States all their rights, title and interest in any and all
2 property constituting, or derived from, any proceeds the defendants
3 obtained, directly or indirectly, as the result of the offenses, and any
4 and all property used or intended to be used in any manner or part to
5 commit and to facilitate the commission of the violations alleged in
6 this 2nd superseding indictment.

7 3. Upon conviction of the offense set forth in Count 6, defendants
8 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]

11 [REDACTED] WONG HUNG NG, aka "Mau," and GILBERTO GERARDO VILLALOBOS ZAMORA,
12 aka "Lic," shall forfeit to the United States, all property, real and
13 personal, involved in such offense, and all property traceable to such
14 property.

15 4. If any of the above referenced forfeitable property, as a
16 result of any act or omission of the defendants:

- 17 a. cannot be located upon the exercise of due diligence;
- 18 b. has been transferred or sold to, or deposited with, a third
19 party;
- 20 c. has been placed beyond the jurisdiction of the Court;
- 21 d. has been substantially diminished in value; or
- 22 e. has been commingled with other property which cannot be
23 subdivided without difficulty;

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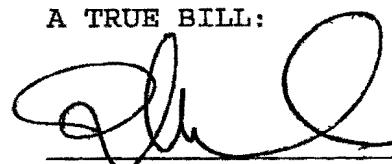
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1 it is the intent of the United States, pursuant to Title 21, United
2 States Code, Section 853(p), to seek forfeiture of any other property
3 of the defendants up to the value of the said property listed above as
4 being subject to forfeiture.

5 All in violation of Title 21, United States Code, Section 853 and
6 Title 18, United States Code, Section 982.

7 DATED: January 12, 2017.

8 A TRUE BILL:
9



10 Foreperson

11 ALANA W. ROBINSON
12 Acting United States Attorney

13 
14 By: JOSHUA P. JONES
15 Assistant U.S. Attorney

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